

### **REMARKS**

This paper is responsive to the Office Action mailed March 27, 2007. Claims 1-13, 15, 16, 18, 19 and 21 are pending. Claim 1 has been amended. No new matter has been added.

At paragraph 6, the Examiner objects to the title of the invention as not descriptive. The Applicant amends the title to overcome this objection. Accordingly, that objection should be withdrawn.

At paragraph 8, the Examiner rejects claims 1 and 10 as being directed to non-statutory subject matter. Accordingly, claims 1 and 10 have been amended to recite “generating” instead of “forming,” pursuant to the Examiner’s suggestion. Accordingly, those rejections should be withdrawn.

At paragraph 9, the Examiner rejects claims 1-7, 12 and 13 as depending from rejected claim 1. Since the rejection to claim 1 has been overcome, those rejections should also be withdrawn.

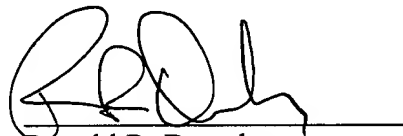
At paragraph 10, claim 21 is rejected as being directed to non-statutory subject matter. The Applicant respectfully submits that claim 21 is directed to statutory subject matter and respectfully traverses the Examiner’s objection. The claimed steps of “(a) receiving the subject code..., (b) generating an intermediate representation from the subject codes...’ and (c) converting the intermediate representation into target code... and generating target code instructions which read to and write from the allocated target registers...” clearly include a tangible result. The word “representing” appears in the sub-steps of step (b) in this method as part of the generation of the intermediate representation. However, the method of claim 21 is not merely the act of “representing” as a thought or abstract idea. The Applicant respectfully submits that the Examiner’s suggestion of “generating a network” is not appropriate in the context of claim 21.

The pending Office Action was mailed on March 27, 2007, so the statutory period for response expires on June 27, 2007. Accordingly, Applicant respectfully submits that this response is being timely filed.

In view of the above amendment and remarks, the Applicant believes the pending application is in condition for allowance. No other fees are believed to be due in connection with the filing of this response, however the Commissioner is authorized to debit Deposit Account No. 08-0219 for any required fee necessary to maintain the pendency of this application.

Dated: June 20, 2007

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'R. Demsher', is written over a horizontal line.

Ronald R. Demsher  
Registration No.: 42,478  
Attorney for Applicant(s)

Wilmer Cutler Pickering Hale and Dorr LLP  
60 State Street  
Boston, Massachusetts 02109  
(617) 526-6000 (telephone)  
(617) 526-5000 (facsimile)